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## Before the ILLINOIS COMMERCE COMMISSION

		COMMERCE COMMISSION
CBB Carrier Services, Inc.	)	2006 JAN 25 ₱ 12: 53
Application for a Certificate of Local	)	Docket No.
Authority to Operate as a Reseller and	)	CHIEF CLERK'S OFFICE
Facilities Based Carrier of Telecommunications	)	
Services in the State of Illinois	)	06-W74

## MOTION OF CBB CARRIER SERVICES, INC. FOR A PROTECTIVE ORDER

CBB Carrier Services, Inc. ("CBB"), hereby files this Motion for a Protective Order pursuant to Section 200.430 of the Illinois Administrative Code seeking confidential treatment of the financial information that was submitted as part of CBB's above referenced Application, filed on December 5, 2005. Specifically, the financial statements contained in Attachment A to the Application are non-public and CBB considers them to be confidential and proprietary. Attached to this Motion and identified as Attachment B to the Application, is a redacted, public version of the financial statements contained in Attachment A.

In support of this Motion, CBB provides the following:

- 1. CBB is a wholly owned subsidiary of Continental Broadband, Inc., which in turn is a wholly owned subsidiary of Landmark Communications, Inc. Landmark and its subsidiaries are privately-held companies and, accordingly, the financial information included with CBB's Application is not readily available to the public or other persons or organizations not affiliated with CBB or its parent corporation;
- 2. Because CBB's financial information is not publicly available, its public disclosure as a result of the Application may cause direct, immediate, and substantial harm to CBB, its affiliates, and its parent, Landmark, by providing its competitors and potential

competitors with detailed information about its current financial position and financing activities that would not otherwise be available to them;

3. Therefore, given the commercially sensitive nature of CBB's financial information, CBB requests that the Commission prevent public disclosure of the financial statements by issuing a Protective Order finding that the financial statements included in Attachment A are to be afforded confidential treatment and are available only to the Commission and its staff. CBB requests such confidential treatment for a period of five (5) years subsequent to the date of the Application.

Respectfully submitted,

John Rickman

Vice President and Chief Financial Officer

Continental Broadband, Inc.

253 Monticello Avenue, Suite 200

Norfolk, VA 23510-2522

(757) 222-5303 (telephone)

(757) 222-5314 (facsimile)

On behalf of CBB Carrier Services, Inc., a wholly owned affiliate of Continental Broadband, Inc.